

# LEE COUNTY BOARD OF EDUCATION

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Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

September 5, 2013

Dear Sir/Madame,

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes changes to the E-Rate program. Before delving into my response to the proposed changes, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

Lee County School District is located in the scenic Eastern Kentucky foothills of the Appalachian Mountains. We serve approximately 1,100 students in grades K-12, housed in one high school (9-12), one middle school (6-8), two elementary schools (K-5), and an area technology center (9-12). The district has consistently emphasized academic quality. In addition, the district is committed to providing 21st Century Learning instructional materials and equipment to our staff and students. Without the E-Rate program, we would NEVER be able to provide adequate technology resources to our schools. E-Rate helps fund resources that are absolutely essential to the operation of the schools. These resources include voice and data communication service and network communication hardware. See the services and funds provided through E-Rate listed below:

- a. Maintain basic and long distance telephone service
  - i. E-Rate provides 90% of the annual cost of about \$15,000
- b. Maintain fiber network connectivity to our elementary schools
  - i. E-Rate provides 90% of the annual cost of about \$42,000
- c. Replace network infrastructure components such as routers, switches, wireless controllers, access points, and other such items periodically.
  - i. E-Rate provides 90% of the cost every 5 or 6 years. In funding year 2012, the total cost to refresh these network components was about \$330,000.

The E-Rate program is a program succeeding in its mission. As the FCC moves forward with this NPRM, it is prudent to remain focused on the fact that E-Rate is a program that works and that any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding. The single most effective step the FCC can take to bolster E-Rates current and future success is to provide \$5 billion in funding, an amount commensurate with current demand.

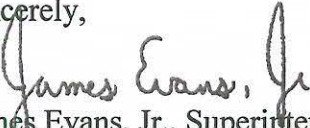
There are additional programmatic changes and restructuring that can provide additional efficiencies and savings. To rely solely on programmatic efficiencies, however, without providing additional new funding is a shortsighted solution, a policy that fails to address the program's most significant problem: inadequate funding.

I think this NPRM is an opportunity to tackle the important work of expanding a successful program. E-Rate is not a broken program that needs to be fixed; it is a successful program that schools and libraries continue to rely on, a program that must continue to provide funding critical for telecommunications and connectivity.

Over the past few years, vendors have gotten clever with how they bundle products and services to get them on the Eligible Services List. This expansion of eligible services has created a huge drain on the E-Rate program which has, in turn, limited the availability of funding to school districts. If funding for the E-Rate program cannot be drastically increased, the eligible services should be restricted to only technology products and services that are absolutely essential to the operation of school districts. Of course, substantially increasing the E-Rate program's funding is also essential and warranted as schools become increasingly dependent on their technology infrastructure to deliver instruction and educational opportunities to their students.

Thank you for considering my response as you move forward with your decision on the E-Rate program. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-Rate program, and to ensure that the program and its limited resources are protected and preserved.

Sincerely,

  
James Evans, Jr., Superintendent  
Lee County Schools

JEJ:sga